

Remarks

Applicant respectfully requests reconsideration of the present application in light of the foregoing amendments and following remarks.

Claims 1-12, 16-29, 31-37, and 53-55 remain pending. Claims 13-15, 30, and 38 are cancelled. Claims 39-46 and 48-52 were previously cancelled. Claims 1, 16, 31, 53, and 54 are independent.

Claims 56-57 are added. No new matter is added.

Claims 1-6, 9, 11, 12, 16-20, 23-27, 29, 31-35, and 53-55 are amended. No new matter is added.

Claims 1-38, 47, and 53-55 are rejected. These rejections are respectfully traversed.

Remaining Claims 1-12, 16-29, 31-37, and 53-55 are Patentable over Burget and Szondy under 35 U.S.C. § 103

The Office Action ("Action") rejects claims 1-38, 47, and 53-55 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,557,005 to Burget ("Burget") in view of U.S. Pub. No. 2002/0078253 of Szondy ("Szondy"). Claims 13-15, 30, 38, and 47 are cancelled and, as a result, the rejections thereof are rendered moot. Applicant respectfully traverses the rejections of the remaining claims 1-12, 16-29, 31-37, and 53-55.

Claims 1-12

Independent claim 1 as amended is directed to an apparatus for presenting content to a user, and recites the following features:

- a device to concurrently display at least a first gadget and a second gadget to the user;

- a plurality of layout strings files, wherein each layout string file comprises at least one layout string, each layout string comprising a language-dependent text string suitable to be displayed on a gadget;

- a plurality of layout information files (LIFs), wherein each LIF describes how at least one particular layout string is to be displayed on a particular gadget for a unique combination of a language and a device, the plurality of LIFs comprising:

- a first LIF describing how at least a first layout string is to be displayed on the first gadget based on a combination of the device and a first language; and
 - a second LIF describing how at least a second layout string is to be displayed on the second gadget based on a combination of the device and a

second language, wherein the second language and the first language are different; and
a computer to store the layout strings files and the layout information files.

Burget does not teach or suggest anything pertaining to gadgets, let alone “a device to concurrently display at least a first gadget and a second gadget to the user,” as recited in independent claim 1; rather, Burget merely involves the formation and use of web forms, *i.e.*, electronic data entry forms, *see* col. 1, lines 8-12.

Furthermore, Burget does not teach or suggest anything pertaining to concurrently displaying multiple items in different languages. For example, Burget describes “providing web-site interaction with a user in *an appropriate language*,” *see* col. 2, lines 58-60 (emphasis added), and directs attention to Fig. 2, which specifies at 201 that a user selects a webform and *a single language* “in which he or she wishes to communicate,” *see* col. 4, lines 43-48. Fig. 2 of Burget goes on to specify at 205 that the server “will assemble a web form with the appropriate data entry devices in *the appropriate language* as arranged according to the appropriate template,” *see* col. 5, lines 10-17 (emphasis added). Consequently, Burget does not teach or suggest at least the recited “first LIF describing how at least a first layout string is to be displayed on the first gadget based on a combination of the device and a first language” and “second LIF describing how at least a second layout string is to be displayed on the second gadget based on a combination of the device and a second language, wherein the second language and the first language are different,” as recited in independent claim 1.

Szondy does not cure the deficiencies of Burget. For example, Szondy does not teach or suggest anything pertaining to gadgets and, consequently, Szondy does not teach or suggest at least “a device to concurrently display at least a first gadget and a second gadget to the user,” as recited in independent claim 1. Further, nothing in Szondy teaches or suggests concurrently displaying multiple items in different languages. Therefore, Szondy does not teach or suggest at least “a first LIF describing how at least a first layout string is to be displayed on the first gadget based on a combination of the device and a first language” and “a second LIF describing how at least a second layout string is to be displayed on the second gadget based on a combination of the device and a second language, wherein the second language and the first language are different,” as recited in independent claim 1.

Because Burget and Szondy do not teach or suggest every feature recited in independent claim 1, the 35 U.S.C. § 103(a) rejection of the claim should be withdrawn and such action is respectfully requested.

Dependent claims 2-12 depend from independent claim 1 and are allowable for at least the reasons presented above with respect to the parent claim 1. Accordingly, the 35 U.S.C. § 103(a) rejections of dependent claims 2-12 should be withdrawn and such action is respectfully requested.

Dependent claims 2-12 are also independently patentable. For example, Burget does not teach or suggest “a ranked list of languages specifying a plurality of languages preferred by the user and an order based on the user’s preferences” and “means for selecting one of the plurality of layout information files and one layout strings file based on a ranked list of languages specifying a plurality of languages preferred by the user and an order based on the user’s preferences,” as recited in dependent claims 3 and 12, respectively. Indeed, neither Fig. 1 nor any other portion of Burget teaches anything pertaining to a ranked list in which languages are ordered based on the user’s preferences. Consequently, dependent claims 3 and 12 should be allowed for at least these additional reasons.

Claims 16-29

Independent claim 16 as amended is directed to a computer-implemented method for displaying content to a user, and recites the following features:

- locating a first layout information file (LIF) and a second LIF from a plurality of layout information files, the first LIF specifying how a first layout string is to be presented to the user for a unique combination of a first language and a device, and the second LIF specifying how a second layout string is to be presented to the user for a unique combination of a second language and the device, wherein the first and second languages are different;

- locating a first layout strings file and a second layout strings file from a plurality of layout strings files, the first layout strings file storing the first layout string, and the second layout strings file storing the second layout string;

- presenting the first layout string to the user according to the first LIF; and
- presenting the second layout string to the user according to the second LIF, wherein the first and second layout strings are presented concurrently.

As discussed above, Burget does not teach or suggest anything pertaining to concurrently presenting multiple items in different languages. Consequently, Burget does not teach or suggest

at least “locating a first layout information file (LIF) and a second LIF from a plurality of layout information files, the first LIF specifying how a first layout string is to be presented to the user for a unique combination of a first language and a device, and the second LIF specifying how a second layout string is to be presented to the user for a unique combination of a second language and the device, wherein the first and second languages are different,” “presenting the first layout string to the user according to the first LIF” and “presenting the second layout string to the user according to the second LIF, wherein the first and second layout strings are presented concurrently,” as recited in independent claim 16.

Szondy fails to cure the deficiencies of Burget because Szondy similarly fails to teach or suggest anything pertaining to concurrently presenting multiple items in different languages, as discussed above. Therefore, Szondy does not teach or suggest at least “locating a first layout information file (LIF) and a second LIF from a plurality of layout information files, the first LIF specifying how a first layout string is to be presented to the user for a unique combination of a first language and a device, and the second LIF specifying how a second layout string is to be presented to the user for a unique combination of a second language and the device, wherein the first and second languages are different,” “presenting the first layout string to the user according to the first LIF” and “presenting the second layout string to the user according to the second LIF, wherein the first and second layout strings are presented concurrently,” as recited in independent claim 16.

Because Burget and Szondy do not teach or suggest every feature recited in independent claim 16, the 35 U.S.C. § 103(a) rejection of the claim should be withdrawn and such action is respectfully requested.

Dependent claims 17-29 depend from independent claim 16 and are allowable for at least the reasons presented above with respect to the parent claim 16. Accordingly, the 35 U.S.C. § 103(a) rejections of dependent claims 17-29 should be withdrawn and such action is respectfully requested.

Dependent claims 17-29 are also independently patentable. For example, as discussed above, Burget does not teach or suggest “a ranked list of languages” in which languages are ordered based on the user’s preferences. It follows that Burget does not teach or suggest at least “receiving a ranked list of languages from the user, the ranked list comprising a plurality of

languages in an order based on preferences of the user,” as recited in dependent claim 20. Consequently, dependent claim 20 should be allowed for at least these additional reasons.

Claims 31-37

Independent claim 31 as amended is directed to one or more computer-readable media containing a program to display content to a user, and recites the following features:

location software to locate a first layout information file (LIF) and a second LIF from a plurality of layout information files, the first LIF specifying how a first layout string is to be presented to the user for a unique combination of a first language and a device, and the second LIF specifying how a second layout string is to be presented to the user for a unique combination of a second language and the device, wherein the first and second languages are different;

location software to locate a first layout strings file and a second layout strings file from a plurality of layout strings files, the first layout strings file storing the first layout string, and the second layout strings file storing the second layout string; and presentation software to concurrently present the first and second layout strings to the user according to the first and second layout information files, respectively.

As discussed above, Burget does not teach or suggest anything pertaining to concurrently presenting multiple items in different languages. Consequently, Burget does not teach or suggest at least “location software to locate a first layout information file (LIF) and a second LIF from a plurality of layout information files, the first LIF specifying how a first layout string is to be presented to the user for a unique combination of a first language and a device, and the second LIF specifying how a second layout string is to be presented to the user for a unique combination of a second language and the device, wherein the first and second languages are different” and “presentation software to concurrently present the first and second layout strings to the user according to the first and second layout information files, respectively,” as recited in independent claim 31.

Szondy fails to cure the deficiencies of Burget because Szondy similarly fails to teach or suggest anything pertaining to concurrently presenting multiple items in different languages, as discussed above. Therefore, Szondy does not teach or suggest at least “location software to locate a first layout information file (LIF) and a second LIF from a plurality of layout information files, the first LIF specifying how a first layout string is to be presented to the user for a unique combination of a first language and a device, and the second LIF specifying how a second layout string is to be presented to the user for a unique combination of a second language

and the device, wherein the first and second languages are different” and “presentation software to concurrently present the first and second layout strings to the user according to the first and second layout information files, respectively,” as recited in independent claim 31.

Because Burget and Szondy do not teach or suggest every feature recited in independent claim 31, the 35 U.S.C. § 103(a) rejection of the claim should be withdrawn and such action is respectfully requested.

Dependent claims 32-37 depend from independent claim 31 and are allowable for at least the reasons presented above with respect to the parent claim 31. Accordingly, the 35 U.S.C. § 103(a) rejections of dependent claims 32-37 should be withdrawn and such action is respectfully requested.

Dependent claims 32-37 are also independently patentable. For example, as discussed above, Burget does not teach or suggest “a ranked list of languages” in which languages are ordered based on the user’s preferences. It follows that Burget does not teach or suggest at least “reception software to receive a ranked list of languages from the user, the ranked list comprising a plurality of languages in an order based on preferences of the user,” as recited in dependent claim 35. Consequently, dependent claim 35 should be allowed for at least these additional reasons.

Claim 53

Independent claim 53 as amended is directed to an apparatus for presenting content to a user, and recites the following features:

- a file storing a plurality of layout strings sub-files and a plurality of layout information sub-files to describe how content and a layout string are displayed for a unique combination of a language and a device;
- a resource file map to store at least two combinations of the layout information sub-file and languages in which the layout strings sub-files store the layout strings;
- a computer to store the file and the resource file map;
- a ranked list of languages specifying a plurality of languages preferred by the user and an order based on the user’s preferences; and
- a selector to select one of the plurality of layout information sub-files and one layout strings sub-file based on the ranked list of languages and the resource file map.

As discussed above, Burget does not teach or suggest “a ranked list of languages” as recited in the claims, *e.g.*, in which languages are ordered based on the user’s preferences. It follows that Burget does not teach or suggest at least “a ranked list of languages specifying a

plurality of languages preferred by the user and an order based on the user's preferences," as recited in independent claim 53. Szondy fails to cure the deficiencies of Burget because Szondy similarly fails to teach or suggest the recited "ranked list of languages."

Because Burget and Szondy do not teach or suggest every feature recited in independent claim 53, the 35 U.S.C. § 103(a) rejection of the claim should be withdrawn and such action is respectfully requested.

Claims 54 and 55

Independent claim 54 as amended is directed to a gadget file structure, and recites the following features:

- a first directory storing at least two layout strings files, each layout strings file storing a layout string in a language;

- a second directory storing a first layout information file for a first combination of a first language and a device, the first layout information file designed to be combined with one of the layout strings files and a first content to display a first layout string and the first content to a user in the first language on the device;

- a third directory storing a second layout information file for a second combination of a second language and the device, the second layout information file designed to be combined with one of the layout strings files and a second content to display a second layout string and the second content to the user in the second language on the device, wherein the first and second contents are displayed concurrently, and wherein the first and second languages are different; and

- a resource file map identifying valid combinations of layout information files and languages in which the layout strings files store layout strings for the device.

As discussed above, the combination of Burget and Szondy does not teach or suggest anything pertaining to concurrently displaying multiple items in different languages to a user. Consequently, Burget does not teach or suggest at least "a second directory storing a first layout information file for a first combination of a first language and a device, the first layout information file designed to be combined with one of the layout strings files and a first content to display a first layout string and the first content to a user in the first language on the device" and "a third directory storing a second layout information file for a second combination of a second language and the device, the second layout information file designed to be combined with one of the layout strings files and a second content to display a second layout string and the second content to the user in the second language on the device, wherein the first and second contents

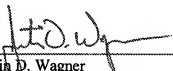
are displayed concurrently, and wherein the first and second languages are different,” as recited in independent claim 54.

Because Burget and Szondy do not teach or suggest every feature recited in independent claim 54, the 35 U.S.C. § 103(a) rejections of claim 54 and its dependent claim 55 should be withdrawn and such action is respectfully requested.

Conclusion

Applicant submits that the present application is in condition for allowance and such action is respectfully requested.

Respectfully submitted,


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